

EXHIBIT A

EXHIBIT 1

REDACTED VERSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CISCO SYSTEMS, INC.,

Plaintiff,

vs.

Civil Action No.

ARISTA NETWORKS, INC.,

5:14-cv-5344-BLF

Defendant.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF ANSHUL SADANA,

VOLUME I

March 17, 2016

9:36 a.m. - 7:42 p.m.

555 Twin Dolphin Drive, 5th Floor

Redwood Shores, California

REPORTED BY:

James Beasley

CSR No. 12807, CCR No. 835, RPR

1 Q. Besides the VLAN mapping interface
2 functionality, do you recall making any other CLI
3 command submissions to the parser-police during your
4 tenure at Cisco?

5 A. Let me think this through, see what other
6 features I worked on. There likely would have been
7 some debug commands, show debug or show platform
8 commands. But I don't remember if I was driving
9 that through parser-police myself or someone else in
10 the business unit. But certainly those are some of
11 the commands I had worked on.

12 Q. Sitting here today, do you have any
13 specific recollection of how the sure debug command
14 (verbatim) CLI interface was developed?

15 A. No, I don't.

16 Q. Can you think of any other CLI proposals
17 that you could have made to the parser-police, other
18 than the VLAN mapping CLI and the sure debug
19 (verbatim) CLI?

20 A. These are the -- these are the ones that
21 come to mind. If I worked on other features and
22 there were CLIs related to that, I'm sure I would
23 have submitted those to parser-police as well.

24 Q. Was it a requirement at Cisco that every
25 CLI command proposal be first vetted by the

1 parser-police before it's implemented?

2 MR. FERRALL: Objection. Lacks
3 foundation.

4 BY MR. PAK:

5 Q. To your knowledge?

6 A. Was it a mandate that every command be
7 submitted to parser-police?

8 Q. Yes.

9 MR. FERRALL: Same objection.

10 THE WITNESS: I don't recall whether it
11 was a mandate or not. But the desired outcome was
12 that all commands be approved by parser-police so
13 that you don't have divergence across products.

14 BY MR. PAK:

15 Q. Was there a formal approval committee
16 associated with the parser-police?

17 A. None that I can recall.

18 Q. So how would a particular command proposal
19 be approved by the parser-police if there was no
20 central committee?

21 A. It was a distribute community group and
22 you would just have to go convince the community
23 and -- and debate with them if you needed to.

24 Q. Who -- so there would be debates among the
25 members of the community about the pros and cons of

1 various CLI command proposals; is that right?

2 A. I would say there would be different types
3 of debates. Some of them would be, why are you
4 implementing this command because a similar command
5 already exists on a different platform or a
6 different train of code; why didn't you just use the
7 same.

8 The other one would be to make sure
9 everything fits the language that IOS CLI had, which
10 the users were used to.

11 And then there were debates on pros and
12 cons as well.

13 Q. So how -- so when any of these debates
14 occur on the parser-police, based on your knowledge
15 and experience with the parser-police e-mail that's
16 at Cisco, how would the debates ultimately conclude
17 into a final approval?

18 MR. FERRALL: Objection. Vague and
19 ambiguous. Lacks foundation. Compound.

20 THE WITNESS: I think the final approval
21 wasn't a formal final approval. It was building
22 consensus within the community and if someone had
23 specific objections, responding to it and going in
24 and doing your feature.

25 Because parser-police was a collection of

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1 business units or representation of business units
2 at Cisco you wouldn't want to have a CLI that's
3 different than when -- what the rest of the
4 community thinks you should have, because then
5 you're divergent. At some point you run into a
6 conflict.

7 In most cases my guess is everyone would
8 try to resolve it one way or the other and -- and
9 keep arguing until you get resolution.

10 BY MR. PAK:

11 Q. Could those arguments last days sometimes?

12 A. Yes.

13 Q. There were some pretty heated debates
14 sometimes on the parser-police?

15 A. There were lots of debates. I don't
16 remember them at this point. But yes.

17 Q. And engineers can have pretty strong
18 opinions about what they think is right or wrong
19 when it comes to CLI syntax, correct?

20 A. I think it's --

21 MR. FERRALL: Calls -- calls for opinion
22 testimony.

23 You can answer.

24 THE WITNESS: Engineers can have opinions.
25 But also when it's a very large collection of

1 engineers, then getting consensus is harder.

2 BY MR. PAK:

3 Q. You had some strong views as well on
4 certain aspects of CLI syntax, correct, while you
5 were at Cisco?

6 A. For the features I was involved in, yes.

7 Q. One of the things that I saw in the back
8 and forth involving you on the parser-police is this
9 idea of extensibility when coming up with CLI
10 syntax; do you recall that?

11 MR. FERRALL: Objection. Vague and
12 ambiguous.

13 THE WITNESS: I don't recall the
14 specifics. But if there's a document that shows
15 that e-mail I'm happy to read it to jog my memory.

16 BY MR. PAK:

17 Q. Let's start going through some of these
18 documents that we have from your files.

19 MR. PAK: So I'll introduce my first
20 deposition exhibit for the day which I believe is
21 Exhibit 357.

22 (Sadana Exhibit 357 was marked for
23 identification and attached to the
24 transcript.)

25 (Off-the-record discussion.)

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1 BY MR. PAK:

2 Q. All right. Mr. Sadana, I've handed you
3 Exhibit Number 357. It's a document bearing the
4 Bates label CSI-CLI-773843.

5 Do you see this?

6 A. Yes.

7 Q. Okay. Is that your name at the very top?

8 A. Yes.

9 Q. And then do you see the subject is:

10 "Please review the CLI" -- "the new CLI
11 command"?

12 A. That's right.

13 Q. And it was sent on August 14th, 2002.

14 Do you see that?

15 A. That's right.

16 Q. And do you have any reason to dispute this
17 particular document?

18 A. No.

19 Q. So you're writing to somebody named Fendi.

20 Do you see that?

21 A. Yes.

22 Q. Do you recall who Fendi was at the time?

23 A. No.

24 Q. Okay. So would you read into the record
25 your e-mail at the bottom there starting with:

A horizontal bar chart consisting of 20 black bars. The bars are arranged in a single column, with the longest bars at the top and bottom, and the shortest in the middle. The chart is set against a white background with a vertical gray line on the left.

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[REDACTED]

[REDACTED]

[REDACTED]

4 Q. Are you denying, sir, that you told Arista

5 customers that your CLI is just like Cisco's CLI?

6 A. That's not what you asked.

7 Q. I'm asking you that question right now.

8 Are you denying, sir, that you told Arista

9 customers that your CLI is just like Cisco's CLI?

10 A. I'm not denying that.

11 Q. You said that, correct?

12 A. No. Yeah, I said that.

13 Q. Yeah?

14 A. Yeah.

15 Q. And others have said that at Arista,

16 correct?

17 A. Yes --

18 (Overlapping speakers.)

19 MR. FERRALL: That's all right. There's

20 no --

21 THE WITNESS: Okay.

22 MR. FERRALL: -- there's no question.

23 THE WITNESS: Okay.

24 MR. PAK: You want to add?

25 THE WITNESS: No.

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